

IN RE: PETITION FOR SPECIAL HEARING \* BEFORE THE  
SW/S Deereco Road, 460 ft. \* ZONING COMMISSIONER  
S of c/l Padonia Road \* OF BALTIMORE COUNTY  
9603 Deereco Road, Suite 108 \*  
8th Election District \* CASE # 93-220-SPH  
4th Councilmanic District \*  
Deereco Limited Partnership \*  
Petitioner \*

\*\*\*\*\*

FINDINGS OF FACT AND CONCLUSIONS OF LAW

This matter comes before the Zoning Commissioner as a Petition for Special Hearing, for that property located at 9603 Deereco Road in the Timonium section of Baltimore County. The Petitioner, Deereco Limited Partnership, seeks approval of the use of a portion of the property as a practice facility for the sport of conventional/international pistol competition, including Olympic style pistol competition, pistol practice and/or silhouette pistol practice. Further, a smaller section of the leased property will be used as an office to support such a use.

Appearing on behalf of the Petition was Kurt Petrucci, the Chief Executive Officer of the Amateur Pistol Organization of Maryland. Mr. Petrucci's organization is the proposed lessee/operator of the pistol range. Also appearing in support of the Petition was Charles K. Stark, the surveyor who prepared the plat, and Chris Walsh, a representative of the owner of the site. Also present in support of the Petition was Richard Whiting, an expert firearms range developer from the National Rifle Association, and Alden S. Bradstock, a mechanical engineer, specializing in the design of heating, ventilating and air conditioning systems. The Petitioner was represented by Michael E. Marino, Esquire. Appearing as Protestants were Thomas Kelly and Matthew Walker, both representing the Greater Timonium Community Council.

ORDER RECEIVED FOR FILING  
Date 4/1/93  
By Mr. Stark

Mr. Stark testified and presented the plan which is marked as Petitioner's Exhibit No. 1. He noted that the site is a 10+ acre parcel which abuts Deereco Road on the east and Baltimore Harrisburg Expressway (I-83) on the west. It is located among an office/warehouse corridor which runs from Timonium Road to the south to Padonia Road to the north. The site is zoned M.L.-I.M. Additionally, the site is improved by an existing masonry building which is approximately 172,000 sq. ft. in area.

Mr. Walsh testified that he represents the owner of the building, the Deereco Limited Partnership. He noted that office space in the building is leased by a number of tenants, including the United States Post Office, Federal Armored Express, C.T. Management, Trane Air Conditioning and a similar mix of tenants. His firm has entered into a conditional lease with the American Pistol Organization of Maryland to occupy 6800 sq. ft. of space in the building. Mr. Walsh also testified that both his company and the other tenants do not object to the proposed use.

Extensive testimony was received from Kurt Petrucci. As noted above, Mr. Petrucci is the driving force behind the Amateur Pistol Organization in Maryland. He described his organization as one which serves the pistol/shooting enthusiasts in Maryland. He testified that shooting is an amateur sport and enjoys inter-collegiate recognition as same by the NCAA. He noted that there are several area colleges which sponsor shooting teams on the inter-collegiate level. However, upon graduation from college by these team members, there are few facilities where enthusiasts of the sport can continue to practice their advocacy. The proposed range will serve these individuals. He also described the proposed facility in detail which is depicted not only on Petitioner's Exhibit No. 1, the site plan, but also Petitioner's Exhibit No. 2, a floor plan of the leased space. He testified that

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Date 4/1/93  
By Mr. Stark

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only members of his organization would use the facilities and that there are no accommodations for spectators. He also testified that the proposed range was located exclusively within the interior of the building and thus would neither be heard nor seen from the outside. Mr. Petrucci also stated that there would be no provision for public paid admission to the events conducted at the site, and no facilities for either food or drink are available on the premises. He also described the physical construction of the proposed facility. He noted that he had received significant assistance from the National Rifle Association in the design of the floor plan.

Discussing that floor plan in detail was Richard Whiting, the Manager of the NRA Range Development Unit for 15 years. Mr. Whiting has extensive experience in the development of ranges and qualified as an expert in that field. He believes that the use of the site as a pistol range is compatible with other tenants in the building and an appropriate use of this building. He also described in detail the many safety features designed into the construction of the range.

Lastly, Alden Bradstock testified. Mr. Bradstock is a mechanical engineer who described in detail the proposed HVAC system to be installed on the premises. This system is designed to prevent lead and other pollutants from contaminating the property and being ingested by employees and members who will use the facility.

In opposition to the Petition, testimony was received from Messrs. Kelly and Walker. They are both concerned about the adverse effect of the facility on the residential community of Timonium Heights which is located nearby. They expressed concerns over pollution, traffic, potential crime and safety factors.

ORDER RECEIVED FOR FILING  
Date 4/1/93  
By Mr. Stark

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Although much of the testimony and evidence presented related to potential effects of the use on the surrounding locale, this case is not a Petition for Special Exception. Rather, the case is filed as a Petition for Special Hearing. The Petitioner avers that the range facility is permitted by right in this zone. In this respect, the Petitioner relies on Section 253.123 A(40a) of the Baltimore County Zoning Regulations (B.C.Z.R.). That section lists uses permitted as of right in an M.L. zone. Among those allowed are "Practice or training physical conditioning facilities and fields for amateur or professional sports organizations provided that there shall not be any accommodations for public spectators, that no more than one sports organization can use such a facility at one time, and that no such facility includes any lighting of types that would produce substantial off site illumination, nor any provisions for selling public admissions to sports events to be conducted thereon." Further, the regulation allows offices to be included at the facility as are necessary for the administration of the organization. Broken down into its components, the Petitioner alleges that the proposed facility meets each of the six requirements in this definition.

First, the Petitioner alleges that the proposed facility is clearly a practice facility. This assertion is clearly correct. The entire goal of the facility is to provide a practice range for shooting enthusiasts. Thus, the Petitioner complies with this requirement.

Second, the Petitioner must show that the facility is used by an amateur or professional sports organization. As to this requirement, a determination must be made as to whether the proposed activity is indeed a sport. Section 101 of the B.C.Z.R. provides that words not defined therein shall accept the definition contained in Webster's Third New International Dictio-

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By Mr. Stark

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nary of the English Language Unabridged. Webster defines a sport as "Something that is a source of pleasant diversion or a particular play, game or mode of amusement." Also, Webster notes that a sport can be "A game or contest especially one involving individual skill or physical prowess." In evaluating the proposed activity within the context of this definition, one must conclude that firearms shooting at this site is indeed a sport. That this activity is recognized as an inter-collegiate sport competition by the NCAA is also persuasive. Indeed, shooting has long been considered a sport and is, in fact, part of the Olympic games competition. Thus, the Petitioner has satisfied this portion of the definition.

The remaining 4 considerations provided by the definition relating to the requirements that there be no accommodation for spectators, that use of the facility is limited to one organization, that there be no off-site lighting and that no public admissions are permitted, were all addressed by Mr. Petrucci. The Protestants could not rebut his testimony as to these issues, in any manner.

Therefore, based on the overwhelming testimony and evidence offered, it is clear that the proposed use is permitted as of right in an M.L. zone, pursuant to Section 253.123 A(40a) of the B.C.Z.R. Thus, the Petition for Special Hearing must be granted. Moreover, I am also persuaded that this use will not be detrimental to the health, safety or general welfare of the locale. It is clear that practice facilities such as what is proposed are highly regulated and carefully constructed so as to provide the maximum safety to the customers of the range and to prevent any adverse impact to the surrounding community. There was extensive testimony presented as to the safety features built into the facility which will eliminate sound outside of the building, will control lead pollution or similar obnoxious ef-

ORDER RECEIVED FOR FILING  
Date 4/1/93  
By Mr. Stark

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fects, and will generally eliminate any impact to the range's neighbors. If properly maintained, it is clear that the use proposed will not be detrimental to either the participants, co-tenants of the building and surrounding residential and commercial property owners.

Pursuant to the advertisement, posting of the property, and public hearing on this Petition held, and for the reasons given above, the Petition for Special Hearing should be granted.

THEREFORE, IT IS ORDERED by the Zoning Commissioner of Baltimore County this 15<sup>th</sup> day of April, 1993 that, pursuant to the Petition for Special Hearing, approval of the use of the property as a practice facility for the sport of conventional/international pistol competition, including Olympic style pistol competition, pistol practice and/or silhouette pistol practice, in accordance with Petitioner's Exhibit No. 1, be and is hereby GRANTED.

1. The Petitioner is hereby made aware that proceeding at this time is at its own risk until such time as the 30 day appellate process from this Order has expired. If, for whatever reason, this Order is reversed, the Petitioner would be required to return, and be responsible for returning, said property to its original condition.

LES:mmn

ORDER RECEIVED FOR FILING  
Date 4/1/93  
By Mr. Stark

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Baltimore County Government  
Zoning Commissioner  
Office of Planning and Zoning



Suite 113 Courthouse  
400 Washington Avenue  
Towson, MD 21204

(410) 887-4386

March 31, 1993

Michael E. Marino, Esquire  
609 Bosley Avenue  
Towson, Maryland 21204

RE: Petition for Special Hearing  
Case No. 93-220-SPH  
Deereco Limited Partnership, Petitioner

Dear Mr. Marino:

Enclosed please find the decision rendered in the above captioned case. The Petition for Special Hearing has been granted in accordance with the attached Order.

In the event the decision rendered is unfavorable to any party, please be advised that any party may file an appeal within thirty (30) days of the date of the Order to the County Board of Appeals. If you require additional information concerning filing an appeal, please feel free to contact our Appeals Clerk at 887-3391.

Very truly yours,

Lawrence E. Schmidt  
Zoning Commissioner

LES:mmn

att.  
cc: Mr. Kurt Petrucci  
cc: Mr. Charles K. Stark, G.W. Stephens & Assoc.  
cc: Mr. Chris Walsh  
cc: Mr. L. Thomas Kelly, Greater Timonium Community Council



**Petition for Special Hearing**  
to the Zoning Commissioner of Baltimore County  
for the property located at 9603 Deereco Road, Suite 108  
which is presently zoned MLIM

This Petition shall be filed with the Office of Zoning Administration & Development Management. The undersigned, legal owner(s) of the property situated in Baltimore County and which is described in the description and plat attached hereto and made a part hereof, hereby petition for a Special Hearing under Section 500.7 of the Zoning Regulations of Baltimore County, to determine whether or not the Zoning Commissioner should approve the use of the Property as follows:  
(a) 1,375 square feet +/- to be used as office.  
(b) 5,600 square feet +/- to be used for a practice facility for the sport of conventional/international pistol competition, including Olympic-style pistol competition, pistol practice and/or silhouette pistol practice.

Property is to be posted and advertised as prescribed by Zoning Regulations. I, or we, agree to pay expenses of above Special Hearing advertising, posting, etc., upon filing of this petition, and further agree to and are to be bound by the zoning regulations and restrictions of Baltimore County adopted pursuant to the Zoning Law for Baltimore County.

We do solemnly declare and affirm, under the penalties of perjury, that I/we are the legal owner(s) of the property which is the subject of this Petition.

Legal Owner(s)  
Deereco Limited Partnership

(Type or Print Name)  
Signature  
Anthony Julia

Address  
(Type or Print Name)  
City  
Date  
Zipcode

Signature  
410 887-4386

Address  
(Type or Print Name)  
City  
Date  
Zipcode

Signature  
410 887-4386

Address  
(Type or Print Name)  
City  
Date  
Zipcode

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410 887-4386

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410 887-4386

Address  
(Type or Print Name)  
City  
Date  
Zipcode

Signature  
410 887-4386





FEBRUARY 19, 1993

NOTICE OF REASSIGNMENT

CASE NUMBER(S): 93-220-SPH  
LEGAL OWNER: DEEREKO LIMITED PARTNERSHIP  
LOCATION: 9640 DEEREKO ROAD

HEARING OF THE ABOVE MATTER WILL TAKE PLACE AS FOLLOWS:

TUESDAY, MARCH 23, 1993 at 9:30 a.m.

IN THE BALTIMORE COUNTY COURTHOUSE, ROOM 118, 400 WASHINGTON AVENUE,  
TOWSON, MARYLAND 21204.

*Arnold Jablon*

ARNOLD JABLON  
DIRECTOR

cc: Deereco Limited Partnership  
Michael E. Marino, Esq.  
David Roger Allen

111 West Chesapeake Avenue  
Towson, MD 21204

January 26, 1993

(410) 887-3353

Michael E. Marino, Esquire  
609 Bonley Avenue  
Towson, MD 21204

RE: Case No. 93-220-SPH, Item No. 227  
Petitioner: Deereco Limited Partnership  
Petition for Special Hearing

Dear Mr. Marino:

The Zoning Plans Advisory Committee (ZAC) has reviewed the plans submitted with the above referenced petition. The attached comments from each reviewing agency are not intended to indicate the appropriateness of the zoning action requested, but to assure that all parties, i.e. Zoning Commissioner, attorney and/or the petitioner, are made aware of plans or problems with regard to the proposed improvements that may have a bearing on this case.

Enclosed are all comments submitted thus far from the members of ZAC that offer or request information on your petition. If additional comments are received from other members of ZAC, I will forward them to you. Otherwise, any comment that is not informative will be placed in the hearing file. This petition was accepted for filing on the date of the enclosed filing certificate and a hearing scheduled accordingly.

The following comments are related only to the filing of future zoning petitions and are aimed at expediting the petition filing process with this office.

1) The Director of Zoning Administration and Development Management has instituted a system whereby seasoned zoning attorneys who feel that they are capable of filing petitions that comply with all aspects of the zoning regulations and petitions filing requirements can file their petitions with this office without the necessity of a preliminary review by Zoning personnel.

111 West Chesapeake Avenue  
Towson, MD 21204

(410) 887-3353

Your petition has been received and accepted for filing this  
5th day of January 1993.

*Arnold Jablon*  
ARNOLD JABLON  
DIRECTOR

Received By:

*W. Carl Richards Jr.*  
Chairman,  
Zoning Plans Advisory Committee

Petitioner: Deereco Limited Partnership  
Petitioner's Attorney: Michael E. Marino

1-13-93

Ms. Julie Winiarski  
Zoning Administration and  
Development Management  
County Office Building  
Room 109  
111 W. Chesapeake Avenue  
Towson, Maryland 21204

Re: Baltimore County  
Item No.: + 227 (MJK)

Dear Ms. Winiarski:

This office has reviewed the referenced item and we have no objection to approval as it does not access a State roadway and is not effected by any State Highway Administration projects.

Please contact Bob Small at 410-333-1350 if you have any questions.

Thank you for the opportunity to review this item.

Very truly yours,

*Bob Small*  
for John Contestabile, Chief  
Engineering Access Permits  
Division

1/17/93

My telephone number is 410-333-1350

Teletypewriter for Impaired Hearing or Speech  
383-7555 Baltimore Metro - 585-0451 D.C. Metro - 1-800-482-5062 Statewide Toll Free  
707 North Calvert St., Baltimore, Maryland 21203-0717

700 East Joppa Road, Suite 901  
Towson, MD 21286-5500

JANUARY 13, 1993

(410) 887-4500

Arnold Jablon  
Director  
Zoning Administration and  
Development Management  
Baltimore County Office Building  
Towson, MD 21204

RE: Property Owner: DEEREKO LIMITED PARTNERSHIP

Location: #9603 DEEREKO ROAD, SUITE #108

Item No.: +227 (MJK) Zoning Agenda: JANUARY 19, 1993

Gentlemen:

Pursuant to your request, the referenced property has been surveyed by this Bureau and the comments below are applicable and required to be corrected or incorporated into the final plans for the property.

5. The buildings and structures existing or proposed on the site shall comply with all applicable requirements of the National Fire Protection Association Standard No. 101 "Life Safety Code", 1988 edition prior to occupancy.

REVIEWER: *Carl J. Jones* Noted and Approved  
Planning Division Fire Prevention Bureau  
Special Inspection Division

JP/KEK

1/19/93

DPM/Developers Engineering Division (Public Services)  
Development Review Committee Response Form  
Authorized signature *Deanne A. Lanning* Date *3/1/93*

File Number	Project Name	Waiver Number	Zoning Issue	Meeting Date
DED DEPRM RP STP TE	Zigmas J. And Ona E. Bucevicius	224		1-19-93 NC
DED DEPRM RP STP TE	Ronald D. And Norma J. Jewell	225		NC
DED DEPRM RP STP TE	Steven P. and Deborah J. Benson	226		NC
DED DEPRM RP STP TE	Deereco Limited Partnership	227		NC
DED DEPRM RP STP TE	James R. and Cecile Myrick	228		NC
DED DEPRM RP STP TE	Goucher Woods Development, Inc.	229		NC
DED DEPRM RP STP TE	Connelly Funeral Home	230		comment
DED DEPRM RP STP TE	Orville M. Jones	231		NC
DED DEPRM RP STP TE	Louis A. Slavotinek	232		NC
DED DEPRM RP STP TE	Jack J. Bassel	234		NC
DED DEPRM RP STP TE	G & R No. 3, Inc.	233		1-25-93
DED DEPRM RP STP TE	Congregation Darchel Tzedek, Inc.	235		comment

Department of Environmental Protection & Resource Management  
Development Review Committee Response Form  
Authorized signature *K. E. Smith* Date *2-1-93*

File Number	Project Name	Waiver Number	Zoning Issue	Meeting Date
DEPRM RP STP	Joseph K. And Alva A. Pokorny	216		1-04-93 Written comments
COUNT 1	Worthington Place L.P.	219		1-11-93 NO COMMENTS
DEPRM RP STP	John F. Moore	223		Written comments
COUNT 2	Zigmas J. And Ona E. Bucevicius	224		1-19-93 NO COMMENTS
DED DEPRM RP STP TE	Ronald D. And Norma J. Jewell	225		NO COMMENTS
DED DEPRM RP STP TE	Steven P. and Deborah J. Benson	226		NO COMMENTS
DED DEPRM RP STP TE	Deereco Limited Partnership	227		NO COMMENTS
DED DEPRM RP STP TE	James R. and Cecile Myrick	228		IN PROCESS
DED DEPRM RP STP TE	Goucher Woods Development, Inc.	229		NO COMMENTS
DED DEPRM RP STP TE	Connelly Funeral Home	230		NO COMMENTS
DED DEPRM RP STP TE	Orville M. Jones	231		WRITTEN COMMENTS

BALTIMORE COUNTY, MARYLAND  
INTER-OFFICE CORRESPONDENCE

TO: Arnold Jablon, Director  
Zoning Administration &  
Development Management

DATE: January 29, 1993

FROM: Pat Keller, Deputy Director  
Office of Planning and Zoning

SUBJECT: The Padonia Commerce Building

INFORMATION:

Item Number: 227  
Petitioner: Deereco Limited Partnership  
Property Size: 10.7 acres  
Zoning: ML-IM  
Requested Action: Special Hearing  
Hearing Date: 1/1

SUMMARY OF RECOMMENDATIONS:

The petitioner is requesting a special hearing to approve 1,375 square feet as office; and to approve 5,600 square feet to be used for a practice facility for the sport of conventional/international pistol competition, including olympic-style pistol competition, pistol practice and silhouette pistol practice.

The Office of Planning and Zoning cannot comment adequately since a site plan is not included with the zoning petition. Our office recommends APPROVAL of the petitioner's request. However, there are several items that need to be addressed by the petitioner.

- Will appropriate safety and noise controls be provided?
- Parking calculations should be provided and a site plan showing the location of those spaces should be provided.
- Does adequate landscaping currently exist on this property? This information should be included on the plan.

Prepared by: *Francis Morsey*

Division Chief: *Carol Keller*

PK/FM:rdn

227 ZAC/ZAC1

BUREAU OF TRAFFIC ENGINEERING  
DEPARTMENT OF PUBLIC WORKS  
BALTIMORE COUNTY, MARYLAND

DATE: January 26, 1993

TO: Mr. Arnold Jablon, Director  
Office of Zoning Administration  
and Development Management

FROM: Rahee J. Famili

SUBJECT: Z.A.C. Comments

Z.A.C. MEETING DATE: January 18, 1993

ITEM NUMBER: 227

This office offers no objection to the request, provided adequate on-site parking is provided.

*Rahee's Family*  
Rahee J. Famili  
Traffic Engineer II

RJF/lvd

Note to Hearing Officer:

The plan filed does not meet the requirements for petition acceptance per the B.C.E.R. The petitioner (attorney) insisted on filing this plan because of a time element. Revised plans were supposed to be filed in adequate time for review prior to the zoning hearing.

The zoning office recommends that a new plan be required prior to any decisions. This plan should show all items on the zoning office checklist. Any questions, let me know.

*Match Kellman*

Note to Hearing Officer: *Re: revised plans*

The revised plans were submitted 1 week or less before the revised hearing date. I suggested to the attorney to amend the plan at the hearing. This plan will probably not get distributed to County agencies for review in time. Also, there are several items missing on the plan like setbacks, adjacent buildings and uses. Any questions, give me a yell.

*Match Kellman*  
3/22/93

LAW OFFICES  
LEVY & MARINO, P.A.  
606 BOSLEY AVENUE  
TOWSON, MARYLAND 21204  
(410) 821-0651  
FAX (410) 286-0067

February 1, 1993

VIA HAND DELIVERY

Arnold Jablon, Director  
Baltimore County Office of  
Zoning Administration and  
Development Management  
111 W. Chesapeake Avenue  
Towson, MD 21204

Re: 9630 Deereco Road  
Case No. 93-220-SPH (Item 227)  
Petitioner: Deereco Limited Partnership  
Hearing Date: February 9, 1993, 10:00 a.m.

Dear Mr. Jablon:

On behalf of the Petitioner, this letter will serve as a request for a postponement of the above captioned case. The reason for the postponement is unavailability of expert witnesses who the Petitioner intends to call on its behalf. It is my understanding that such witnesses will not be available until March 1993.

If there is any problem with respect to this postponement, please do not hesitate to contact me.

Thank you for your consideration in this matter.

Very truly yours,

*Michael E. Marino*  
Michael E. Marino

MEW/lrb  
8288lrb  
cc: Deereco Limited Partnership

RECEIVED  
FEB 1 1993  
ZONING OFFICE

THE GREATER TIMONIUM COMMUNITY COUNCIL  
BOX 276 98 WEST RIDGE ROAD TIMONIUM, MARYLAND, 21093  
MARCH 23, 1993

THE GREATER TIMONIUM COMMUNITY COUNCIL, AN UMBRELLA ASSOCIATION REPRESENTING TWENTY COMMUNITY GROUPS IN THE LUTHEVILLE, TIMONIUM, COFFEYSVILLE AREAS, VOTED UNANIMOUSLY AT ITS MARCH MEETING TO OPPOSE THE INSTALLATION OF THE PRACTICE FACILITY FOR PISTOL COMPETITION PLANNED FOR 9603 DEERCO ROAD.

AS A BASIS FOR THIS OPPOSITION OUR CONCERNS LIE NOT ONLY WITH THE RESIDENTS OF TIMONIUM HEIGHTS, A COMMUNITY OF EIGHTY HOMES ADJACENT TO THIS FACILITY, BUT FOR THE NUMEROUS PEOPLE INVOLVED IN THE VARIOUS DAILY ACTIVITIES IN AND AROUND THIS LOCATION. THIS FACILITY LIES IN THE HEART OF THE LARGEST EMPLOYMENT CENTER IN BALTIMORE COUNTY.

THERE SEEMS TO BE MANY QUESTIONS TO BE ANSWERED BEFORE ANY CONSIDERATION CAN BE GIVEN FOR THIS TYPE OF FACILITY:

FIRST- THE ZONING M.C.L.M. MANUFACTURING LIGHT INDUSTRIAL MAJOR, DOES NOT SPECIFICALLY ALLOW PISTOL RANGES ACCORDING TO WHAT WE WERE TOLD BY THE COUNTY PLANNING DEPARTMENT.

SECOND- THE FIRING OF GUNS INDOORS HAS BEEN FOUND TO CREATE SERIOUS LEAD CONTAMINATION. WHAT MEASURES ARE PLANNED TO MEET PROPER ENVIRONMENTAL STANDARDS? WHAT ASSURANCES ARE THERE TO PROTECT NOT ONLY THOSE BREATHING THE AIR INSIDE AND IN ADJACENT AREAS BUT ALSO THE SAFE REMOVAL OF LEAD RESIDUE FROM THE FACILITY DURING A CLEANUP.

THIRD- THE NOISE FACTOR MUST BE CONSIDERED AS TO THE NUISANCE IT WILL GENERATE NOT ONLY IN THE COMMUNITY BUT ALSO WITH ADJACENT BUSINESSES. WILL STATE DECREE STANDARDS BE MET?

FOURTH- THERE ARE OTHER PLANS THAT ZONING DOES NOT ADDRESS SUCH AS TRANSPORTING WEAPONS IN AND OUT OF THE AREA INCREASING THE CHANCES OF ACCIDENTS AND FIREARM THEFTS AND BODILY INJURIES.

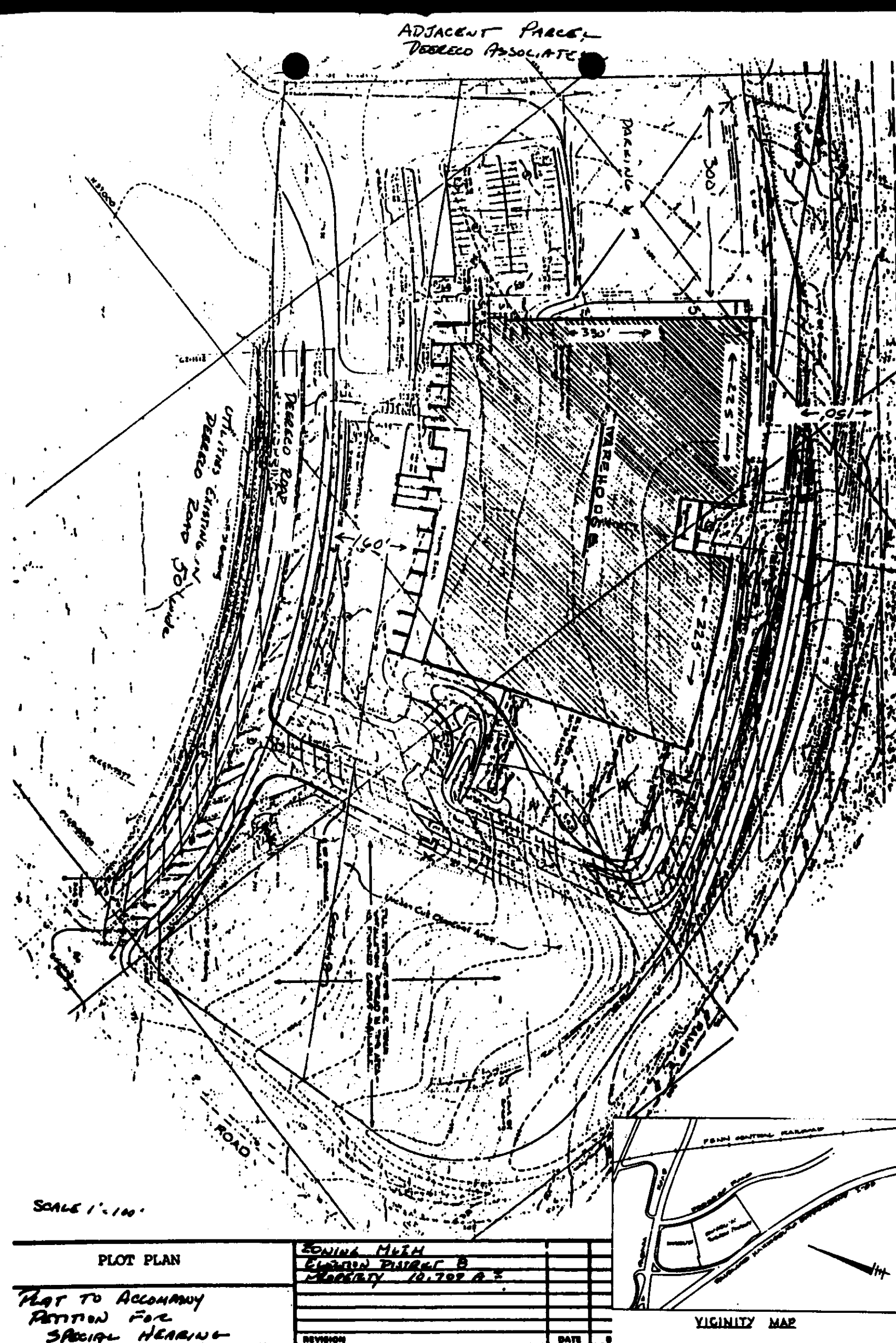
THE G.T.C.C. HAS CONCERNS FOR THE GREATER TIMONIUM COMMUNITY AND THE QUALITY OF LIFE FOR ITS RESIDENTS. IT DOES NOT VIEW THIS SHOOTING FACILITY AS A WELCOME ASSET.

WE APPEAL TO THE WISDOM OF THIS HEARING OFFICER IN DENYING THE PISTOL RANGE.

L. THOMAS KELLY  
CHAIRMAN OF ZONING  
AND DEVELOPMENT

410-252-2796

Page 1



93-220-SPH

#227-Petitioner insists on filing as 15. This plan does not meet requirements of zoning checklist

PLEASE PRINT CLEARLY

PROTESTANT(S) SIGN-IN SHEET

NAME	ADDRESS
L. THOMAS KELLY	121 Timonium Rd
MALE	

PLEASE PRINT CLEARLY

PETITIONER(S) SIGN-IN SHEET

NAME	ADDRESS
CHARLES R. STARK	658 KENKORTH DR.
CHEN WALSH	6440 Deereco Road Timonium MD 21093
CHARLES STARK	658 KENKORTH DR.
W.F. PATRICK	6610 Marietta Avenue Baltimore MD 21244
RICHARD WHITING	3206 Windward Lane Front Royal, VA 22630
ALLEN BRODSTOCK	5141 Netherford Brodstock

# All-Americans From 1936-1990 PETITIONER'S EXHIBIT 3A

## SMALLBORE RIFLE - 1936

First Team  
W. Blennan  
U.S. Naval Academy  
A.W. Broadhead  
Carnegie Inst. of Tech  
A.R. Dervaes  
Carnegie Inst. of Tech  
C.J. Gottfried  
Univ of Minnesota  
P.L. Hooper  
Lehigh Univ  
R. Hughes  
Ohio State Univ  
W.L. Kitch  
U.S. Naval Academy  
A.A. LaBau  
Univ of Washington  
A.L. Mehring Jr.  
Univ of Maryland  
R.K. Sandager  
Univ of Minnesota

Second Team  
T.C. Compton  
U.S. Military Academy  
R. Davis Jr.  
Univ of Maryland  
R. Fordham  
Cornell Univ  
J. Gauber  
Kansas State College  
E.N. Jacobowitz  
New York Univ  
V. Koonin  
Univ of Washington  
R. Nicholson  
U.S. Naval Academy  
T. Richman  
Cornell Univ  
W.F. Stewart  
Kansas State College  
D.D. Wallace  
George Washington Univ

## SMALLBORE RIFLE - 1937

First Team  
G. Giro  
Univ of California  
C.G. Houtsma  
U.S. Coast Guard Academy  
W.L. Kitch  
U.S. Naval Academy  
E.S. Kubick  
Univ of Illinois  
H.H. Moore  
Kansas State College  
T. Mulligan  
George Washington Univ  
R. Nicholson  
U.S. Naval Academy  
R.K. Sandager  
Univ of Minnesota  
C. Vander Heyden  
Univ of California  
D.D. Wallace  
George Washington Univ

Second Team  
J.M. Campbell  
Univ of Nebraska  
J.N. Fisher  
Univ of Minnesota  
J. Harlan  
George Washington Univ  
A. Metlicka  
New York Univ  
G.P. Pribe  
Univ of Minnesota  
W. Sheppard  
Lehigh Univ  
G. Springling  
Univ of Illinois  
L.H. Taylor  
Univ of California  
R. Terry  
Brooklyn Polytech Inst  
E.F. Wosenki  
Connecticut State College

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UNIVERSITY OF MAINE AT MACHIAS  
Recreation Management Bldg.  
Machias, ME 04654

Shooting Program Contact:

Rick Scribner  
(207) 255-3313 ext. 204

MORGAN STATE UNIVERSITY  
ROTC Dept.  
Baltimore, MD 21239-4098

Shooting Program Contact:

SCM Jesse L. Best, Rifle  
(301) 444-3263/64

James Phillips, P.E. Inst.

Maine		DISCIPLINE	PROGRAM	COACH	STATUS	ACTIVITY
<input checked="" type="checkbox"/>	X	Air Rifle				
<input checked="" type="checkbox"/>	X	Smallbore Rifle				
<input checked="" type="checkbox"/>	X	Pistol				
<input checked="" type="checkbox"/>	X	Air Pistol				
<input checked="" type="checkbox"/>	X	Shot				
<input checked="" type="checkbox"/>	X	Trap				
<input checked="" type="checkbox"/>	X	Other				
<input checked="" type="checkbox"/>	X	Physical Education				
<input checked="" type="checkbox"/>	X	Continuing Education				
<input checked="" type="checkbox"/>	X	ROTC				
<input checked="" type="checkbox"/>	X	Varsity Sport				
<input checked="" type="checkbox"/>	X	Club Status				
<input checked="" type="checkbox"/>	X	Athletic Department				
<input checked="" type="checkbox"/>	X	Military Science Dept				
<input checked="" type="checkbox"/>	X	Other				
<input checked="" type="checkbox"/>	X	Shooting Scholarships				
<input checked="" type="checkbox"/>	X	Indoor 50 ft.				
<input checked="" type="checkbox"/>	X	Number of Firing Points - Indoors				
<input checked="" type="checkbox"/>	X	Outdoor				
<input checked="" type="checkbox"/>	X	Shotgun Fields				
<input checked="" type="checkbox"/>	X	Shooting Equipment Provided				
<input checked="" type="checkbox"/>	X	League				
<input checked="" type="checkbox"/>	X	Conference				
<input checked="" type="checkbox"/>	X	NCAA Affiliated Rifle				
<input checked="" type="checkbox"/>	X	ACU-I Shotgun				
<input checked="" type="checkbox"/>	X	Intercollegiate Competition				
<input checked="" type="checkbox"/>	X	Education Only - Non Competitive				

Maryland		DISCIPLINE	PROGRAM	COACH	STATUS	ACTIVITY
<input checked="" type="checkbox"/>	X	Air Rifle				
<input checked="" type="checkbox"/>	X	Smallbore Rifle				
<input checked="" type="checkbox"/>	X	Pistol				
<input checked="" type="checkbox"/>	X	Air Pistol				
<input checked="" type="checkbox"/>	X	Shot				
<input checked="" type="checkbox"/>	X	Trap				
<input checked="" type="checkbox"/>	X	Other				
<input checked="" type="checkbox"/>	X	Physical Education				
<input checked="" type="checkbox"/>	X	Continuing Education				
<input checked="" type="checkbox"/>	X	ROTC				
<input checked="" type="checkbox"/>	X	Varsity Sport				
<input checked="" type="checkbox"/>	X	Club Status				
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<input checked="" type="checkbox"/>	X	Military Science Dept				
<input checked="" type="checkbox"/>	X	Other				
<input checked="" type="checkbox"/>	X	Shooting Scholarships				
<input checked="" type="checkbox"/>	X	Indoor 50 ft.				
<input checked="" type="checkbox"/>	X	Number of Firing Points - Indoors				
<input checked="" type="checkbox"/>	X	Outdoor				
<input checked="" type="checkbox"/>	X	Shotgun Fields				
<input checked="" type="checkbox"/>	X	Shooting Equipment Provided				
<input checked="" type="checkbox"/>	X	League				
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<input checked="" type="checkbox"/>	X	NCAA Affiliated Rifle				
<input checked="" type="checkbox"/>	X	ACU-I Shotgun				
<input checked="" type="checkbox"/>	X	Intercollegiate Competition				
<input checked="" type="checkbox"/>	X	Education Only - Non Competitive				

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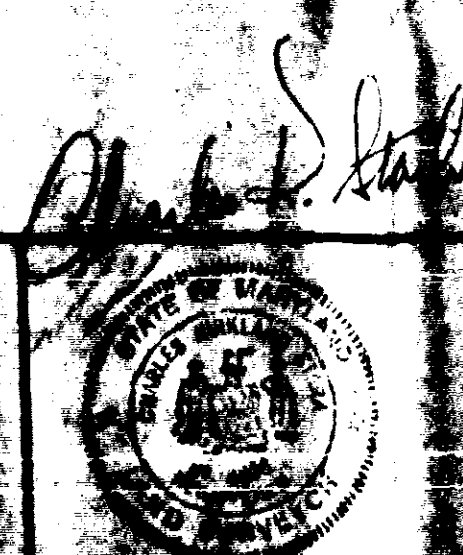
- NOTES:**
1. 3RD COUNCILMANIC DISTRICT
  2. PLAT RECORDED IN E.H.K. JR. 55/47
  3. PUBLIC UTILITIES ARE EXISTING.

**PARCEL B**  
 E.H.K. JR. 55/47  
 DEERECO ROAD ASSOCIATES  
 7814/783

TENANTS	SPACE	TOTAL SPACE	WAREHOUSE EMPLOYEES	OFFICE	WAREHOUSE	TOTAL
BUTLER SERVICES	1000 SF	5,000 SF	1	6	1	7
CT ASSOCIATES, INC.	10000 SF	10,000 SF	0	33	0	33
R.C.I.	2500 SF	4,556 SF	1	10	1	11
DAZ	3556 SF	5,156 SF	0	17	0	17
U.S. POST OFFICE	21066 SF	21,066 SF	0	69	0	69
FEDERAL ARMORED EXPRESS	7200 SF	10,000 SF	1	7	1	8
DUPLEX PRODUCTS	10000 SF	51,846 SF	5	35	5	39
THE TRANE COMPANY	15000 SF	20,582 SF	2	50	2	52
CLARK MOULDING COMPANY	1000 SF	14,270 SF	2	4	2	6
INSURANCE, INCORPORATED	11242 SF	11,242 SF	0	57	0	57
AMPTI-THEATRE	6485 SF	6,485 SF	0	21	0	21
CONTINENTAL ARMS	1470 SF	6800 SF	0	5	0	5
<b>TOTALS</b>	<b>66571 SF</b>	<b>167165 SF</b>	<b>12</b>	<b>292</b>	<b>82</b>	<b>344</b>
				<b>PARKING PROVIDED</b>		<b>405</b>

R=797.80'  
 L=20.31'  
 CH=36577.36'  
 60.61'

N 87° 00' 00" E  
 1/4" = 100'

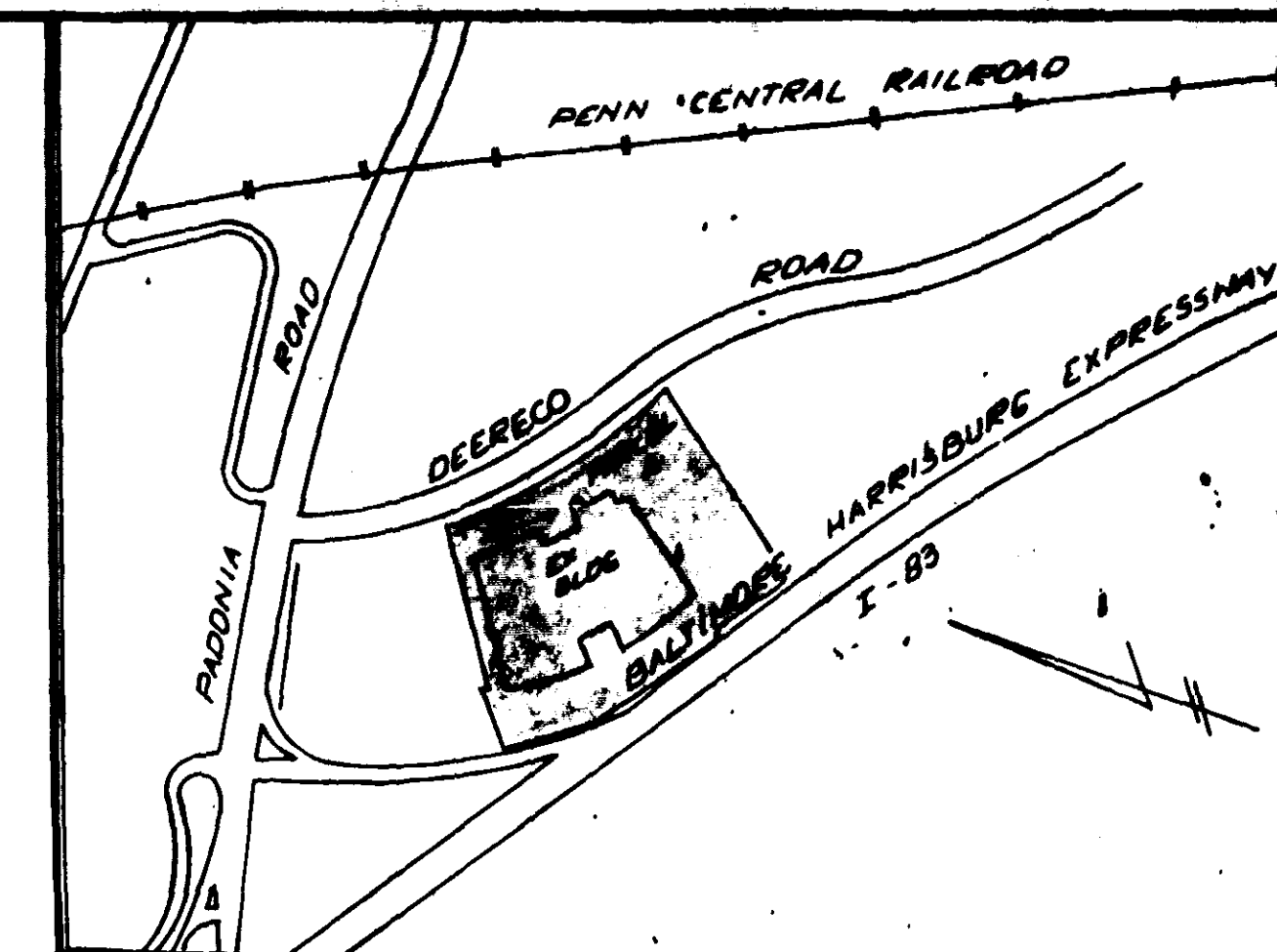


**DRAWN:**  
**DEERECO ROAD LIMITED PARTNERSHIP**  
 2808 WEST JOPPA ROAD  
 SUITE 330, LUTHERVILLE, MD 21088  
 DATED REFERENCE - 6/7/14  
 TA. 465. NO. 08-04-02800

**REVISIONS:**

**PETITIONER'S**  
**EXHIBIT No. 1**

**PLAT TO ACCOMPANY PETITION FOR**  
**SPECIAL HEARING**  
**PARCEL A PADONIA CORPORATE CENTER**  
 3603 DEERECO ROAD, SUITE 108  
 BALTIMORE CO, MD  
 8TH ELEC. DIST.  
 SCALE: 1"=50'  
 DATE, MARCH 3, 1999  
 PJT/67



**VICINITY MAP**

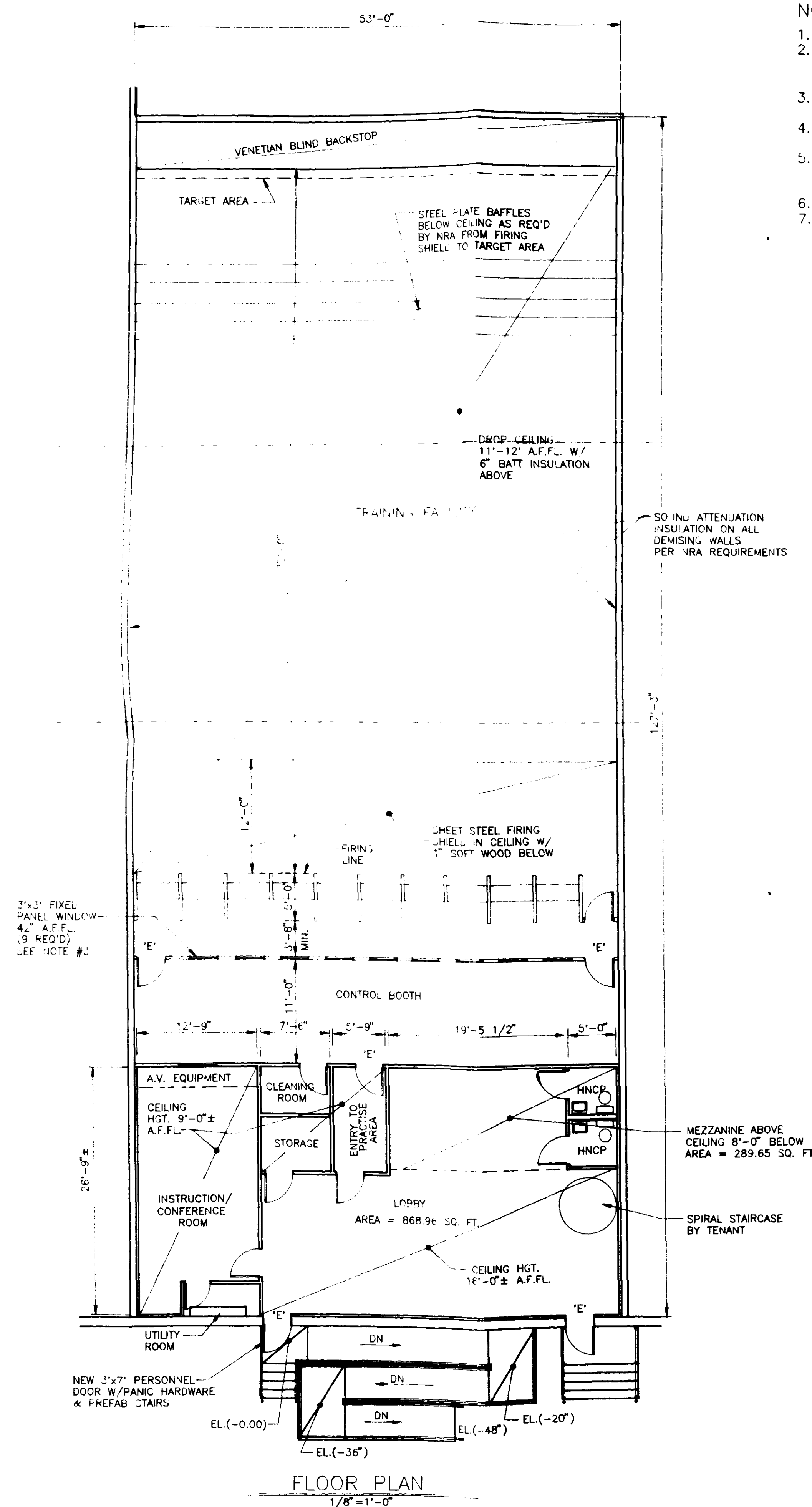
SCALE: 1"=500'

PLAT OF PADONIA PARK  
 E.H.K. JR. 36/70  
 3500 DEERECO RD PARTNERSHIP

**SITE TABULATION**

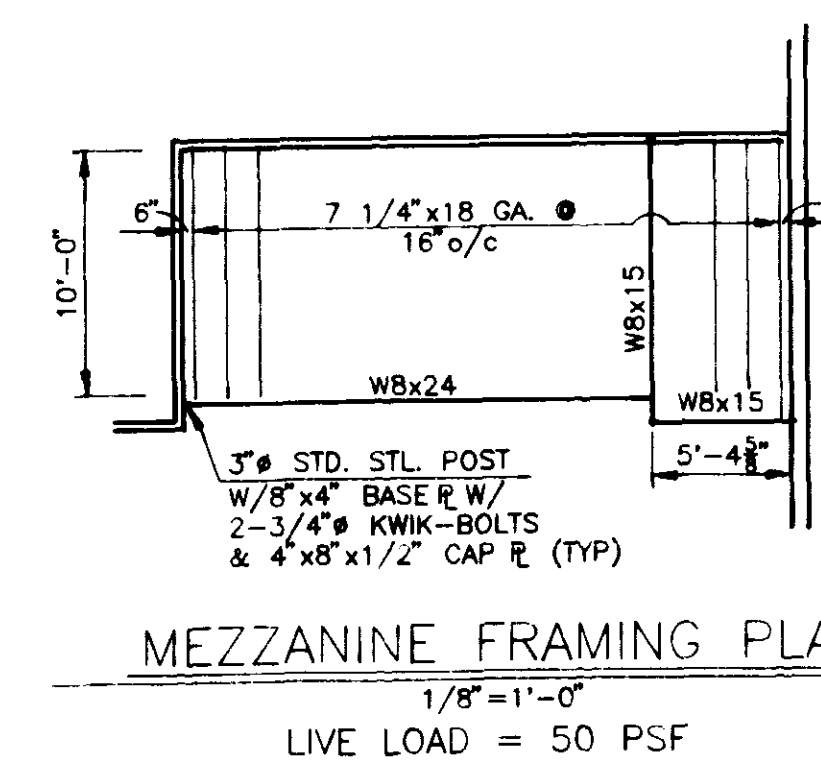
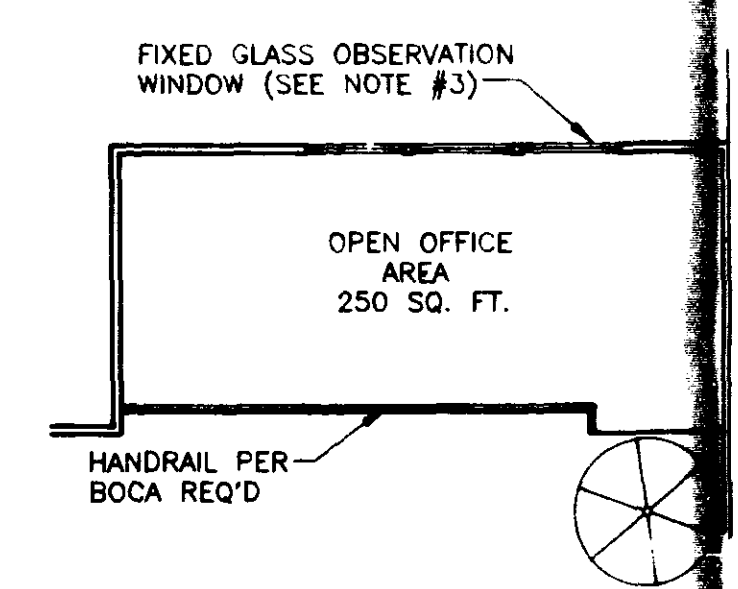
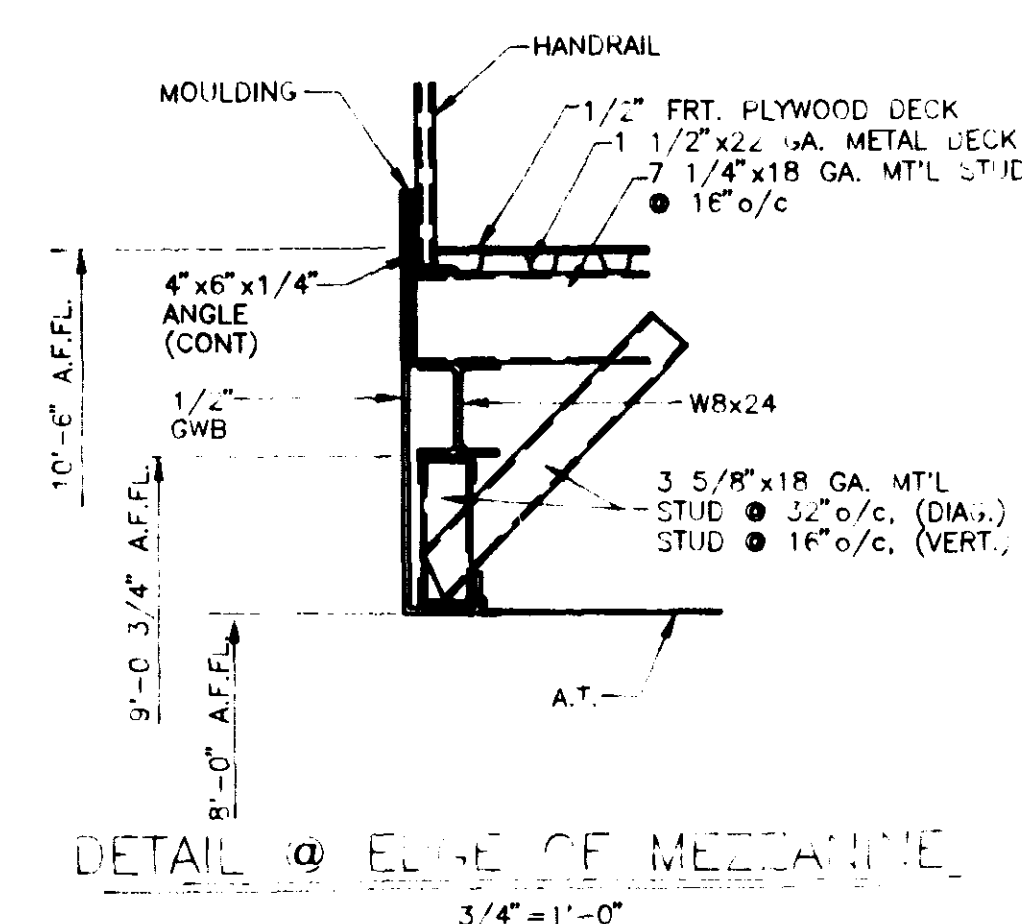
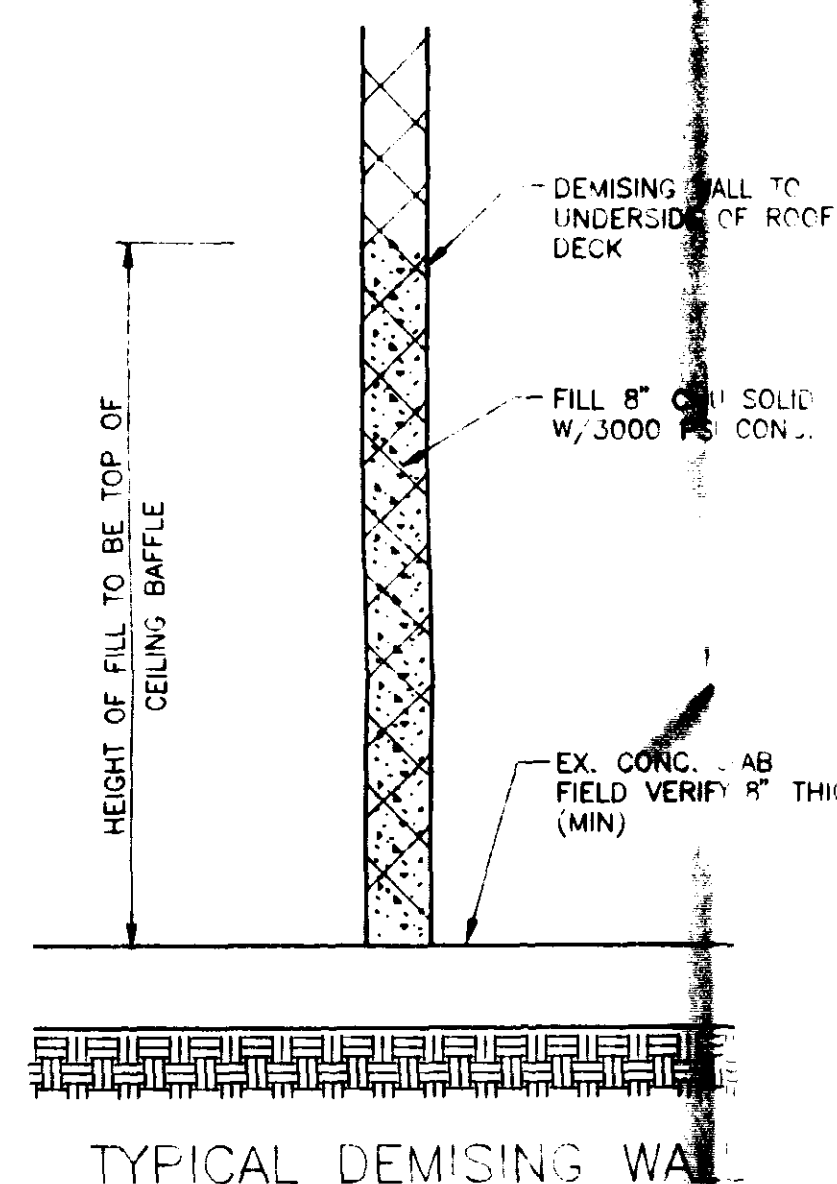
**PARCEL A**  
 ACREAGE - 10.709  
 ZONE - ML-1H  
 EXISTING BLDG. 171547 SF  
 EXISTING PARKING - 405 SPACES

SPECIAL HEARING  
 REQUESTED TO PERMIT A PRACTICE FACILITY FOR  
 THE SPORT OF CONVENTIONAL/INTERNATIONAL  
 PISTOL COMPETITION, INCLUDING OLYMPIC-STYLE  
 PISTOL COMPETITION, PISTOL PRACTICE AND/OR  
 SILHOUETTE PISTOL PRACTICE UNDER  
 SECTION 253.123 A 24-40.4



NOTES:

1. SPACE WILL BE FULLY SPRINKLERED AS REQUIRED BY LOCAL CODE AND NRA.
2. ALL DEMISING WALLS SHALL BE MADE IMPETRABLE BY ONE OF THE FOLLOWING METHODS:
  - a) FILL WALLS SOLID W/ CONCRETE
3. ALL INTERIOR GLAZING SHALL BE DOUBLE THICKNESS SAFETY PLATE PER NRA REQUIREMENTS.
4. FACILITY SHALL BE EQUIPPED WITH A COMMUNICATION SYSTEM, DISTINCT AND SEPERATE FROM THE SOUNDS GENERATED BY RANGE ACTIVITIES.
5. VENTILATION FOR TRAINING FACILITY SHALL BE OVERHEAD, FREE-FLOW SYSTEM DESIGNED PER NRA GUIDELINES. HVAC FOR SHOWROOM, ETC. SHALL BE BUILDING STANDARD.
6. CONTROL BOOTH SHALL BE MANNED AT ALL TIMES. TRAINING FACILITY IS IN USE.
7. SPRINKLER CONTRACTOR TO COORDINATE LOCATION OF HEADS IN TRAINING FACILITY W/ STEEL BAFFLES AND SHIELDS.



- INTERIOR FINISH NOTES

1. "B" EXIT LIGHTS TO BE PROVIDED IN ACCORDANCE WITH NFPA 101 LIFE SAFETY CODE (LATEST EDITION) AND/OR LOCAL AGENCY JOB.
2. FIRE EXTINGUISHERS TO BE PROVIDED IN ACCORDANCE WITH NFPA 101 LIFE SAFETY CODE (LATEST EDITION) AND/OR LOCAL AGENCY JOB. LOCATIONS TO BE DETERMINED BY FIRE DEPARTMENT UPON FINAL INSPECTION.
3. 6 GALLON HOT WATER HEATER TO BE SET ON PLATFORM ABOVE POWDER ROOM AND KITCHEN CEILINGS. HOT WATER HEATER SET SO THAT ELEMENT IS FACING EXTERIOR OR WAREHOUSE WALL SUCH THAT MAINTENANCE DOES NOT REQUIRE REMOVAL OF CEILING TILES.
4. PARTITIONS TO BE 2 1/2" X 25 GA METAL STUDS AT 16" O/C (U.N.O.). FIRE RATED PARTITIONS, IF REQUIRED, SHALL BE AS INDICATED ON THE PLANS.
5. ALL EXTERIOR AND DEMISING WALLS IN FINISHED SPACE SHALL HAVE 1" RIGID INSULATION BETWEEN FURRING STRIPS. POWDER ROOM WALLS SHALL HAVE 2 1/2" BATT INSULATION BETWEEN STUDS. INSTALL 6" BATT INSULATION OVER ALL CEILING IN FINISHED SPACE.
6. CEILING TO BE 2'X4", ACoustICAL TILE IN AN EXPOSED SPLINE GRID SUSPENDED FROM BAR JOISTS. CEILING HEIGHT TO BE 9'-0" ABOVE FINISHED FLOOR (U.N.O.).
7. TOILET ROOMS SHALL BE MECHANICALLY VENTILATED TO THE EXTERIOR OF THE BUILDING.
8. PROVIDE 16"X24" WALL MOUNTED MIRROR AND SOAPDISH OVER SINK IN POWDER ROOM. INSTALL TOILET PAPER HOLDER (SINGLE ROLL).
9. ALL DOORS SHALL BE 2'-0"x6'-8", HOLLOW DOOR WOOD WITH A BRICK VENER (U.N.O.) AND SHALL HAVE 32 INCH MIN. CLEAR OPENING WHEN MEASURED IN ACCORDANCE WITH NFPA.
10. ALL GLAZING IN THE EXTERIOR DOORS, WITHIN 12 INCHES OF ANY EXTERIOR OR INTERIOR DOOR OR WITHIN 18 INCHES OF THE FINISHED FLOOR SHALL BE APPROVED SAFETY GLASS.
11. APPROVED BATTERY POWERED EMERGENCY LIGHTING SHALL BE PROVIDED WITHIN THE SPACE AS REQUIRED BY THE LOCAL CODE (LATEST EDITION).
12. INTERIOR FINISHES SHALL BE CLASS A OR B IN EXITWAYS AND CLASS A, B OR C ELSEWHERE IN ACCORDANCE WITH NFPA.
13. ALL DOORS TO BE LOCATED WITH AT LEAST 18 INCHES FROM THE KNOB TO THE NEAREST FACE OF WALL.
14. ALL EXTERIOR DOOR HARDWARE PROVIDED WITH SHELL. ALL INTERIOR DOORS TO HAVE PASSAGE TYPE (U.N.O.).
15. ALL WALLS TO BE PAINTED WITH 2 COATS FLAT LATEX (U.N.O.). COLORS TO BE SELECTED BY OWNER AND TENANT.
16. ALL OFFICE FLOORS TO BE CARPETED. ALL FLOORS IN TOILET ROOMS AND BREAK ROOMS TO HAVE A VINYL TILE. COORDINATE EXACT FLOOR FINISHES WITH OWNER AND TENANT PRIOR TO INSTALLATION.

**PETITIONER'S**  
**LABBIT** No 2

**PADONIA COMMERCE CENTER**  
DEERECO ROAD  
TIMONIUM, MD 21093

**TIMONIUM, MD 21093**

PADONIA COMMERCE CENTER  
DEERECO ROAD  
TIMONIUM, MD 21093

**CARROLL ENGINEERING INC.**  
115 EAST PADONIA RD SUITE C TIMONIUM MD 21093 (410) 292-6161

11. The following table shows the number of people who have been convicted of a crime in the United States since 1990. The data is presented in millions of people.

$$\| \cdot \|_{\mathcal{H}^1} = \| \cdot \|_{\mathcal{H}^0} + \| \cdot \|_{\mathcal{H}^2}.$$

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Journal compilation © 2006 Blackwell Publishing Ltd

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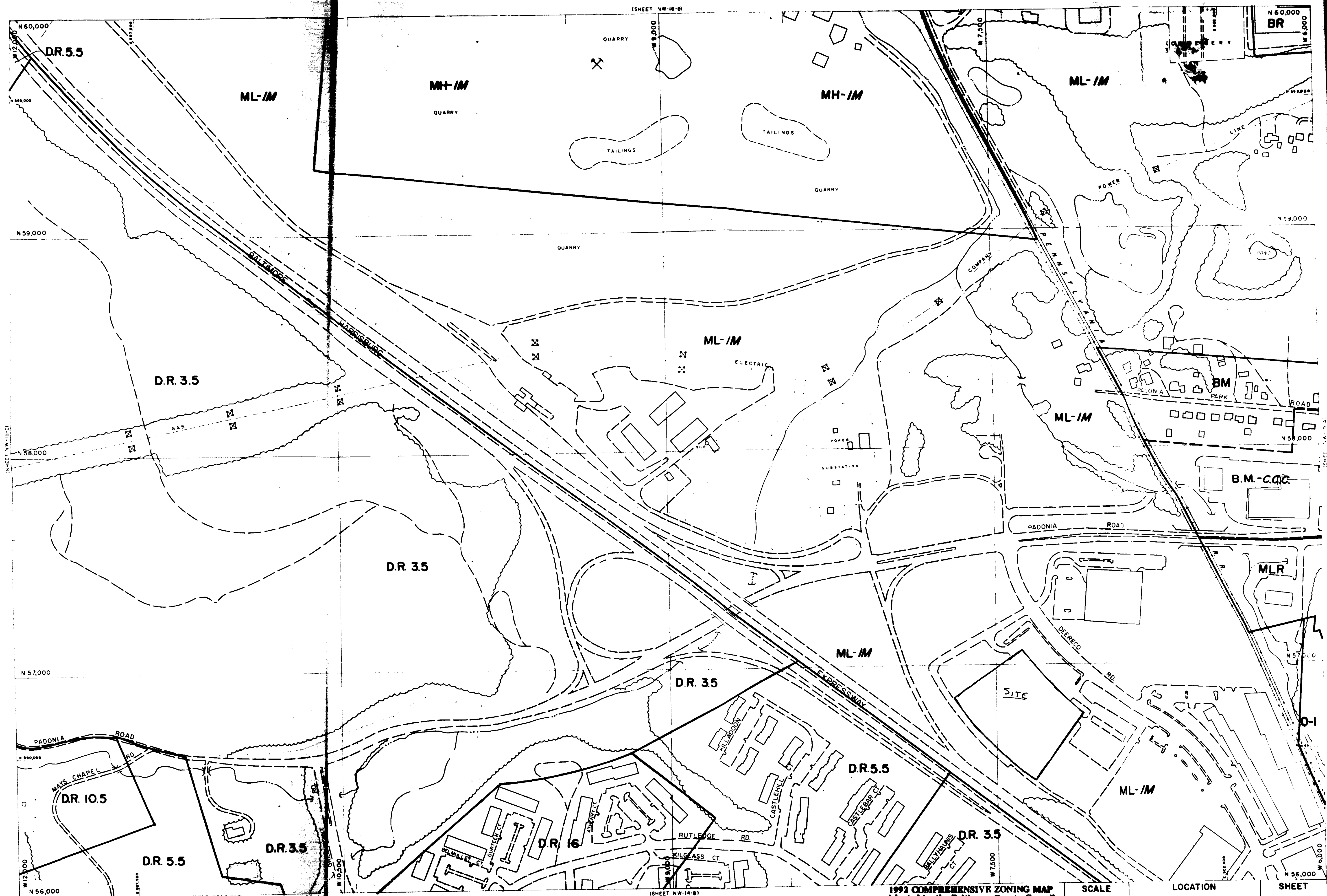
# 15

1996

1

\_\_\_\_\_





S-NE  
V-SE

THIS MAP HAS BEEN REVISED IN SELECTED AREAS.  
TOPOGRAPHY COMPILED BY PHOTOGRAMMETRIC METHODS  
BY BUCHART-HORN, INC. BALTIMORE, MD. 21210

# BALTIMORE COUNTY OFFICE OF PLANNING AND ZONING OFFICIAL ZONING MAP

1992 COMPREHENSIVE ZONING MAP  
Adopted by the Baltimore County Council  
Oct. 15, 1992

THE Nos. 103-00, 104-00, 105-00, 106-00, 107-00, 108-00, 109-00

*William A. Howard*  
Chairman, County Council

SCALE  
1" = 200'

DATE  
OF  
PHOTOGRAPHY  
JANUARY  
1986

LOCATION  
PADONIA

#227

SHEET  
N. W.  
15-B

93-220-SEA